

October 15, 2003

SENT BY E-Mail, and
First Class U.S. Mail

Patricia M. French
Senior Attorney
Bay State Gas Company
300 Friberg Parkway
Westborough, MA 01581-5039

Re: Bay State Gas Company, D.T.E. 03-79

Dear Ms. French:

Enclosed is the first set of information requests by the Department of Telecommunications and Energy to Bay State Gas Company regarding the above-captioned matter. Please submit copies of the Company's responses to the information requests to the Department by 5:00 p.m., October 17, 2003.

Should you have any questions please contact me at (617) 305-3762. Thank you for your prompt attention to this matter.

Sincerely,

Jody Stiefel
Hearing Officer

Enc.
cc: Service List
Mary Cottrell, Secretary

FIRST SET OF INFORMATION REQUESTS OF
THE DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY TO
BAY STATE GAS COMPANY

Pursuant to 220 C.M.R. 1.06(6)(c), the Department of Telecommunications and Energy ("Department") hereby submits to Bay State Gas Company ("Bay State" or "Company") the following information request(s) with respect to the August 7, 2003 filing, D.T.E. 03-79.

INSTRUCTIONS

The following instructions apply to this set of Information Requests and all subsequent Information Requests issued by the Department to the Company in this proceeding.

1. Each request should be answered in writing on a separate, three-hole punch page with a recitation of the request, a reference to the request number, the docket number of the case and the name of the person responsible for the answer.
2. Do not wait for all answers to be completed before supplying answers. Provide the answers as they are completed.
3. These requests shall be deemed continuing so as to require further supplemental responses if Berkshire or its witness receives or generates additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
4. The term "provide complete and detailed documentation" means:

Provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions were used in developing the projections or estimates. Provide and explain all supporting work-papers.
5. The term "document" is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche,

computer printouts, correspondence, handwritten notes, records or reports, bills, checks, articles from journals or other sources and other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.

6. If any one of these requests is ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.
7. Please serve a copy of the responses on Mary Cottrell, Secretary of the Department, one copy to the Service List, four copies to Andreas Thanos, of the Department's Gas Division, and submit one copy of the responses to Jody M. Stiefel, Hearing Officer.

- DTE 1-1 Please refer to page 4, section 13, of the Petition for Approval.
- a. Please explain in detail the “historically weak pressure point in the Lawrence distribution System.”
 - b. Has this weak pressure been a problem in the past? If so, what steps were taken in the past by Bay State to correct this problem?
 - c. How will the approval of this contract improve this historically weak pressure point in the Lawrence distribution System?
- DTE 1-2 Please explain how this proposal is consistent with the Company’s most recently approved Forecast and Supply Plan. Please refer the Department to the relevant pages of the Company’s filing and/or the relevant pages of the Department’s decision. Also, is the proposal consistent with the Company’s pending Forecast and Supply Plan in D.T.E. 02-75? Explain why or why not.
- DTE 1-3 Please refer to page 8, lines 20-22, of Mr. DaFonte’s prefiled testimony. Please discuss the costs associated with the new “facilities” and the new industrial regulator station. Also discuss how Bay State will assign these costs to its customers.
- DTE 1-4 Please refer to page 15, line 11, of Mr. DaFonte’s prefiled testimony. Please elaborate further on the “moderate levels of growth” in the Lawrence division, and how this growth compares to other divisions within the Bay State territory?
- DTE 1-5 Please refer to page 2, paragraph 2 of the Petition for Approval. Please discuss why Bay State refers to the precedent agreement with Tennessee Gas Pipeline Company (“Tennessee”) for year-round firm capacity as “replacement capacity,” when on page 3 of the prefiled testimony of Mr. DaFonte, the Company states the expiring El Paso Agreement is a 30-day peaking service agreement.
- DTE 1-6 Please refer to page 3, paragraph 6 of the Petition for Approval. Why is the Wyeth Pharmaceutical Company’s distribution load referred to as “incremental” when on page 10 of the prefiled testimony of Mr. DaFonte, Wyeth is referred to as a “currently a firm transportation customer on Bay State’s system”? How long has Wyeth been a Bay State customer? What is the current pressure presently feeding the Wyeth plant? What will the pressure be if the lateral is built?
- DTE 1-7 Please refer to page 3, paragraph 6 of the Petition for Approval. The Company

states, “if the Department denies the Wyeth contract, Bay State may renegotiate the design and location of the lateral facilities.” Would the proposed Tennessee contract still be prudent without the Wyeth Contract? Has the Sendout model been run without inclusion of the Wyeth Contract? If so, please provide the results. If not, please run this data through the Sendout model and provide the results. Please also explain to what alternative “design and location” the Company is referring.

- DTE 1-8 Please provide a map of the Company’s Lawrence Division service area and identify the location of the proposed lateral and meter station to be constructed by Tennessee (the Tewksbury-Andover Lateral). Provide a description of all new facilities (mains, service extensions, special metering, etc.) that Bay State and/or Tennessee plan to construct to serve customers utilizing the proposed primary delivery point.
- DTE 1-9 For each of the past five years, please provide, in tabular and graph format, the increase experienced in each of the Company’s customer classes (residential, C&I) in the Lawrence division.
- DTE 1-10 Please provide all necessary documentation indicating that the Company’s customers will not be financially worse off as a result of the proposed Tennessee contract.
- DTE 1-11 Please refer to page 21 of the prefiled testimony of Mr. DaFonte. Please explain the meaning of the “Joint Facilities System.”
- DTE 1-12 Please refer to page 4, paragraph 13 of the Petition for Approval. The Company states, “Bay State believes distribution reliability will be enhanced in the Lawrence Division.” Please provide evidence supporting the Company’s assertion.
- DTE 1-13 Please list any and all upstream contracts that potentially could be delivered through the proposed new meter station.